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January 31, 2025

Via ECF

Magistrate Judge Lee G. Dunst
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Allstate v Braun et al
Case 2:24-cv-02123-NJC-LGD (E.D.N.Y.)

Dear Judge Dunst:

We write according to this Court's directives for a status update as of today's date. Please allow this correspondence to serve as a joint status report by all parties.

As you may recall, this matter involves the theft of a 2022 Lamborghini. This matter is a declaratory judgment action and Allstate is seeking a declaration from the Court that there is no insurance coverage available under an Allstate Auto Policy issued to Helene Braun and Jacob Braun for the theft of a 2022 Lamborghini owned by Yitzchok Wolf and loaned to Jonathan Braun and Miriam Hurwitz, which occurred on October 29, 2022.

Since we last conferenced this case before Your Honor on January 8, 2025, Defendants were able to obtain the information needed on the current condition of the vehicle and make a settlement demand to Allstate. On January 28, 2025 (the day the information was received by our office), Defendants sent Plaintiff a settlement demand with supporting documentation for same. Plaintiff's counsel has forwarded the documentation to Allstate and a conference is being scheduled to discuss same.

The parties therefore jointly respectfully request a stay of discovery or an extension of any discovery deadlines for a few weeks until Plaintiff can respond to Defendants' settlement demand at which point the parties will update Your Honor further. At that time, the parties intend to advise the Court of the likelihood of settlement, if mediation is an option, if Your Honor's involvement in settlement discussions is an option, or if the parties intend on pursuing discovery and/or motion practice.

We thank the Court for its anticipated attention and courtesies in this matter.

Respectfully submitted

Jason J. Rebhun

JJR/
CC: Counsel for Plaintiff (by email and ECF)